IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

HUDSON INSURANCE COMPANY,)	
a Delaware corporation,)	
)	
Plaintiff,)	
)	
V.)	
)	Case No. 21cv01773
W3 LOGISTICS, Inc.,)	
ULYSSES ODISE PRIFTI,)	
and GENTI IKONOMI,)	
)	
Defendants.)	

HUDSON INSURANCE COMPANY'S MOTION FOR ENTRY OF JUDGMENT

Pursuant to Fed. R. Civ. P. 55(b)(1), Hudson Insurance Company ("Hudson") respectfully moves this Court for entry of judgment against Defendant W3 Logistics, Inc. ("W3 Logistics") in light of the default ordered entered by this Court on January 25, 2022 (ECF #42). In support of its request for entry of judgment, Hudson submits the following

- 1. Hudson filed its Complaint for Indemnity on April 1, 2021 (ECF #1).
- W3 Logistics refused to execute the waiver of service sent by Hudson and as such,
 W3 Logistics was served via process server on May 20, 2021 (ECF #9).
- 3. Hudson litigated this case as to other defendants but W3 Logistics never entered an appearance, answered the Complaint, or otherwise contacted the Court. As such, on January 25, 2022, this Court entered an Order of Default against W3 Logistics (ECF \$42).
- 4. Pursuant to Federal Rule of Civil Procedure 55(b)(1), Hudson now requests an entry of judgment as its claim against W3 Logistics is for a sum certain.
- 5. An affidavit confirming the veracity of the allegations and the sum certain due and owing by W3 Logistics is attached. *See* Exhibit A, Prove-Up Affidavit of Susan Miller.

Case: 1:21-cv-01773 Document #: 55 Filed: 03/17/22 Page 2 of 2 PageID #:157

6. Hudson has paid approximately \$84,856.40 as a result of claims and continues to

accrue costs, expenses, and attorneys' fees. A true and accurate copy of the total loss incurred by

Hudson as of January 25, 2022 is attached as Exhibit 3 to the Affidavit of Susan Miller.

7. Accordingly, there is due and owing to Hudson by Defendant W3 Logistics, Inc.

the total amount of \$84,856.40 comprised of the underlying loss on the bond, together with

attorneys' fees, costs, and expenses.

WHEREFORE, Plaintiff Hudson Insurance Company respectfully requests that an Order

of Judgment in the amount of \$84,856.40 be entered against Defendant W3 Logistics, Inc. and for

such other relief as this Court deems just and reasonable.

Respectfully submitted,

/s/ Krysta K. Gumbiner

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